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Counsel to certain members of the Delphi Trade Committee

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
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**VERIFIED AMENDED STATEMENT OF KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP PURSUANT TO BANKRUPTCY RULE 2019(a)**

Kasowitz, Benson, Torres & Friedman LLP (“KBT&F”), submits this verified amended statement (“Verified Statement”) pursuant to Federal Rule of Bankruptcy Procedure 2019(a), and states as follows:

1. KBT&F has been retained as counsel to the following entities (the “Trade Creditors”) in connection with the chapter 11 cases of the above-captioned jointly administered debtors (the “Debtors”) pursuant to an executed retention agreement that is privileged and confidential pursuant to, among other things, the attorney-client privilege:

- Argo Partners, Inc., which has an address of 12 West 37th Street, 9th Floor New York, NY 10018;
- Avenue Capital Management, LLC, which has an address of 535 Madison Avenue, 15th Floor, New York, NY 10022;

- Contrarian Capital Management, L.L.C., which has an address of 411 W. Putnam Avenue, Suite 225, Greenwich, CT 06830;
- Hain Capital Group, which has an address of Meadows Office Complex, 301 Route 17, 6th Floor, Rutherford, NJ 07070;
- King Street Capital Management, L.L.C., as Investment Manager to King Street Capital, Ltd., King Street Capital, L.P. and King Street Institutional, Ltd., which has an address of 65 East 55th Street, 30th Floor, New York, NY 10022; and
- Longacre Fund Management, LLC, which has an address of 810 Seventh Avenue, 22nd Floor, New York, NY 10019.

2. In addition, Bear Stearns Investment Products Inc. and Special Situations Investing Group, Inc. (the "Additional Trade Creditors" and, together with the Trade Creditors, the "Delphi Trade Committee") have retained Ropes & Gray LLP ("R&G") as counsel to represent them in connection with certain matters related to the Debtors' chapter 11 cases.

3. The Trade Creditors and Additional Trade Creditors are the members of the Delphi Trade Committee. KBT&F and R&G have been retained, each on behalf of their respective clients, together to represent the Delphi Trade Committee as counsel in connection with the Debtors' chapter 11 cases, including to address the treatment of holders of trade claims during the Debtors' chapter 11 cases, and ultimately, in any proposed plan of reorganization. Although the Delphi Trade Committee as a committee does not own any claims against the Debtors, collectively, the Trade Creditors own approximately \$100 million of trade claims against the subsidiaries and affiliates of Delphi Corporation and collectively the members of the Delphi Trade Committee currently hold approximately \$200 million of trade claims against the subsidiaries and affiliates of Delphi Corporation. The members of the Delphi Trade Committee acquired their claims after the commencement of the Debtors' chapter 11 cases.

4. Upon information and belief formed after due inquiry, KBT&F does not own any claims against or equity interests in the Debtors.

5. This amended Verified Statement amends in its entirety KBT&F's Verified Rule 2019 Statement dated August 16, 2006.

6. KBT&F reserves the right to revise, to supplement, and to amend this Verified Statement.

Dated: New York, New York
August 29, 2006

KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP

/s/ David S. Rosner

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